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May 1, 2025

**VIA ECF**

The Honorable Analisa Torres  
United States District Court  
Southern District of New York  
United States District Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: Estate of Tamar Kedem Siman Tov, et al. v. UNRWA, et al.**  
**24 Civ. 4765 (AT): Response to Government's Letter**

Dear Judge Torres:

We write on behalf of the Defendants United Nations Relief and Works Agency for Palestine Refugees in the Near East ("UNRWA"), Philippe Lazzarini, Pierre Krähenbühl, Filippo Grandi, Leni Stenseth, Sandra Mitchell, Margot Ellis, and Greta Gunnarsdottir (collectively, "Defendants"), to request leave to respond to the U.S. Government's letter dated April 24, 2025 [ECF No. 59]. This letter marks a reversal of the Government's positions set forth in two prior submissions to the Court [ECF Nos. 17 and 38] and raises several new arguments concerning Defendants' jurisdictional immunity. The Court has previously granted Plaintiffs the opportunity to respond to the U.S. Government's prior submissions. [ECF Nos. 19 and 41]. Thus, without prejudice to Defendants' assertion of immunity and their position that this case should be immediately dismissed, Defendants respectfully request the opportunity to respond to the Government's latest submission by May 22, 2025. We have conferred with Plaintiffs' counsel, and Plaintiffs confirmed that they do not object to Defendants' request.

Defendants reserve all rights, defenses, privileges and immunities and waive none. For the avoidance of doubt, neither this letter nor the appearance of defense counsel should be construed as a waiver of any kind.



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Respectfully,

/s/ Kevin A. Meehan

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